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8 Attorney for Plaintiff,
STATE FARM GENERAL INSURANCE COMPANY

14 STATE FARM GENERAL INSURANCE COMPANY.

No: 4:11-CV-00387 PJH

**REQUEST TO RESCHEDULE
INITIAL CASE MANAGEMENT
CONFERENCE**

VS.

KENNETH WELCH, individually and dba
KENNY'S ROD SHOP and KENNY
WELCH'S ROD SHOP; KENNY'S ROD
SHOP, LLC, also known and doing
business as KENNY'S ROD SHOP -
FABRICATION DIVISION and
KENNY'S ROD SHOP - PARTS, and
DOES 1 to 50, inclusive.

22 || Defendants.

24 AND RELATED THIRD PARTY
COMPLAINT

1 Plaintiff State Farm General Insurance Company, defendant/third party
2 complainant Kenneth Welch, and third party defendant/cross-complainant CPI Global
3 Sourcing, Inc. hereby request that the court reschedule the Case Management Conference in
4 the above-entitled action, currently set for September 15, 2011 at 2:00 P.M. for the following
5 reasons:

6 1). Plaintiff's counsel has a scheduling conflict which just arose in another
7 case on September 15, 2011 that requires his appearance in a matter pending in Los Angeles
8 County Superior Court entitled *Progressive Insurance Company vs. Norcold, Inc., et al.*,
9 LASC No. BC 397219.

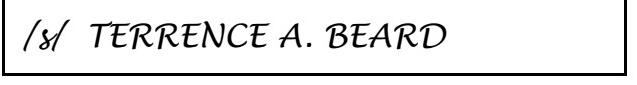
10 2). Pioneer, Inc., a new party to the action (via the Amended Third Party
11 Complaint filed by Kenneth Welch) has not yet filed an appearance in this action;

12 3). Third party defendant CPI Global Sourcing Inc. has filed a counterclaim
13 against Kenny's Rod Shop, Dennis Taylor individually and dba Dennis Taylor Restorations
14 and Reproductions, Pioneer, Inc and Pioneer Automotive Industries, LLC. None of these
15 counter-defendants have made an appearance in this action, with the exception of Kenny's
16 Rod Shop,

17 4). Because all of the parties are not yet before the court, and due to the
18 scheduling conflict regarding plaintiff's counsel, the parties request tha the initial conference
19 in this matter be continued to October 6, 2011.
20

21 DATED: 9/1/11

22 LAW OFFICES OF TERRENCE A.
BEARD

23 
24 /s/ TERRENCE A. BEARD

25 By: _____

26 TERRENCE A. BEARD
27 Attorneys for Plaintiff STATE FARM
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1 GENERAL INSURANCE COMPANY
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4 DATED: DIEPENBROCK & COTTER, LLP
5
6

7 */s/ JOHN P. COTTER*
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9

10 By: JOHN P. COTTER
11 Attorneys for Defendant KENNETH
12 WELCH, individually and dba KENNY'S
13 HOT ROD SHOP
14
15

16 DATED: DONAHUE BATES BLAKEMORE &
17 MACKEY
18
19

20 */s/ WILLIAM K. BLAKEMORE*
21
22

23 By: WILLIAM K. BLAKEMORE
24 Attorneys for Third-Party Defendant and
25 Cross-Complainant CPI GLOBAL
26 SOURCING, INC.
27
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9/9/11

FINAL CONTINUANCE.

